

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Kenneth Harden,

Plaintiff

vs.

The City of Millville, Chief Jody Farabella,
individually and his official capacity, Officer
Jeffrey Proffit, and John Doe Police Officers 1-
10, individually and in their official capacities,

Defendants

CIVIL ACTION

Civil Action No.: 1:17-cv-05127

**MOTION FOR THE PRO HAC VICE
ADMISSION OF
SOLOMON M. RADNER, ESQUIRE**

MOTION FOR THE PRO HAC VICE ADMISSION OF SOLOMON M. RADNER

The above-referenced Plaintiff, through his undersigned counsel, hereby moves this Court pursuant to Local Civil Rule 101.1, to specially admit Solomon M. Radner, Esquire to the bar of this Court for purposes limited to this particular case and to appear and practice before this Court in all proceedings and trial as co-counsel for the Plaintiff herein, and in support thereof, avers as follows:

1. Conrad J. Benedetto, who is a member of the bar of this Court, hereby moves for the *pro hac vice* admission of Solomon M. Radner, Esquire.
2. Solomon M. Radner is an associate of Excolo Law, PLLC., located at 26700 Lahser Road, Southfield, Michigan, and is a member in good standing of the bars of the States of Michigan.

3. Mr. Radner has an existing attorney-client relationship with the Plaintiff herein. He has experience in legal matters relating to this lawsuit and is familiar with the issues raised in this lawsuit.

4. Conrad J. Benedetto, the attorney of record in this matter, will continue to serve as counsel of record for the Plaintiff herein, and will sign all pleadings, briefs, stipulations, and other papers filed with the Court. *See* Certification of Conrad J. Benedetto, attached hereto as Exhibit A.

5. Mr. Benedetto will participate in all proceedings pursuant to Local Rule 101.1.

6. Mr. Radner agrees to submit to all rules of practice and procedure for this Court, and will work closely with the attorney of record, Conrad J. Benedetto in connection with this case. *See* Certification of Solomon M. Radner, attached hereto as Exhibit B.

7. The information required by D.N.J. L. Civ. R. 101.1(c)(2) will be provided to the New Jersey Lawyer's Fund for Client Protection within twenty-one (21) days of the entry of the Court's Order admitting Mr. Radner *pro hac vice*, and the fee required by New Jersey Court Rule 1:28-2 will also be paid within twenty-one (21) days of entry of the Order.

8. A check in the amount of \$150.00, made payable to "Clerk, USDC," for the fee required by D.N.J.L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey is included with this Motion.

WHEREFORE, Conrad J. Benedetto, counsel of record for the Plaintiff herein, respectfully requests that this Honorable Court admit Solomon M. Radner *pro hac vice* pursuant to Local Rule 101.1 of the United States District Court for the District of New Jersey.

Respectfully submitted,

Conrad J. Benedetto, Esquire

Dated: August 4, 2017